

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Case No. 25-20046

v.

Hon. Matthew F. Leitman

D-1 Mubasher Riaz,
D-2 Muzzammil Riaz,

Violations: 18 U.S.C. § 1349

Defendants.

_____ /

INFORMATION

The United States Attorney charges:

COUNT ONE

18 U.S.C. § 1349

Conspiracy to Commit Wire Fraud

D-1 Mubasher Riaz,
D-2 Muzzammil Riaz

1. Beginning in or around July 2017, and continuing through in or around November 2023, in the Eastern District of Michigan, Southern Division, and elsewhere, the defendants, Mubasher Riaz and Muzzammil Riaz did knowingly, intentionally, and willfully combine, conspire, confederate, and agree with each other to commit wire fraud; that is, knowingly, willfully, and with the intent to defraud, having devised and intending to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent

pretenses, representations, and promises, knowing such pretenses, representations, and promises were false and fraudulent when made, transmit and cause to be transmitted, by means of wire, radio, and television communication, writings, signals, pictures, and sounds in interstate and foreign commerce for the purposes of executing such scheme and artifice; in violation of Title 18, United States Code, Section 1349.

2. The purpose of the conspiracy was for the defendants to obtain online goods for free by submitting fraudulent refund claims, to then re-sell the online goods for profit, and to use proceeds obtained through the fraudulent refund scheme to enrich themselves.

3. The manner and means by which the defendants and their co-conspirators sought to accomplish the purpose of the conspiracy included, among others, the following:

4. *Step 1.* The defendants purchased goods such as electronic devices and clothing from online vendors.

5. *Step 2.* When making purchases, defendants would occasionally use their own names, but would also use different identities, virtual private networks, different electronic devices, and/or other means intended to conceal their identities, in order to avoid fraud detection by the online vendors.

6. *Step 3.* After receiving the purchased goods, defendants would submit refund claims, falsely claiming the purchased goods were defective.

7. *Step 4.* Despite submitting a refund, the defendants would not return the purchased goods. Instead, the defendants would either ship back an empty box or a counterfeit or alternative item, such as a book, that matched the expected shipment weight of the return, and wait for the online vendor to issue a refund. Defendants would often use an alternate identity for the return address.

8. *Step 5.* The defendants would then re-sell the purchased goods for profit.

9. Throughout the conspiracy, the defendants made use of an ongoing WhatsApp chat consisting of thousands of text messages and images. In these chats, the defendants discuss nearly every aspect of the scheme, except for Step 5.

10. D-1, Mubasher Riaz, was primarily responsible for reselling the goods for profit. Mubasher would compensate D-2, Muzzammil Riaz, for the purchases and refunds that Muzzammil made.

11. In total, the defendants attempted to fraudulently obtain over \$700,000 in online goods using their refund scheme.

FORFEITURE ALLEGATION

18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c)
Criminal Forfeiture

D-1 Mubasher Riaz,
D-2 Muzzammil Riaz.

1. The allegations contained in Counts One of this Information are incorporated by reference for the purpose of alleging forfeiture under Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Section 2461(c).

2. Under Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Section 2461(c), if convicted of one or more of the charged offenses, the defendants shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. As part of the forfeiture in this case, the United States intends to seek a money judgment.

3. If, because of any act or omission of the defendants, any of the property described above:

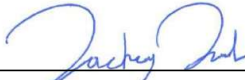
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be
divided without difficulty,

the United States of America shall seek forfeiture of substitute property pursuant to
Title 21, United States Code, Section 853(p), as incorporated by Title 28, United
States Code, Section 2461(c).

JULIE A. BECK
Acting United States Attorney

SARA D. WOODWARD
Chief, General Crimes Unit



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Dated: January 30, 2025

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 25-20046
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials:

Case Title: USA v. D-1 Mubasher Riaz, D-2 Muzzammil Riaz

County where offense occurred : Washtenaw and elsewhere

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☒ Information --- **no** prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

January 30, 2025
Date

s/ Zachary A. Zurek
 Zachary A. Zurek
 Assistant United States Attorney
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.